

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DAVID GROSS, et al.,

PLAINTIFFS.

v.

PRINCE GEORGE'S COUNTY,
MARYLAND, *et al.*

DEFENDANTS.

CIVIL ACTION No.: 8:24-CV-0994-ABA

CONSENT MOTION TO EXTEND DEADLINES IN THE SCHEDULING ORDER

NOW COMES the Plaintiffs, David Gross and Charles Russell, by and through their attorney, Ray M. Shepard and The Shepard Law Firm and pursuant to Fed. R. Civ. P. 6(b) and Local Rule 105(9), respectfully requests that the Court extend the deadlines set in this Court's Order Amending the Scheduling Order (ECF No. 22) setting new deadlines in this matter. As good cause for the requested relief, Plaintiffs states as follows:

1. Plaintiff's Counsel, Ray M. Shepard is working to streamline discovery in this matter by combining duplicative discovery requests across multiple cases. Coordinating depositions that will be relevant across multiple cases will minimize the impact to non-party's schedules.

2. The parties are requesting that the schedule be extended as follows:

<u>Description</u>	<u>Current Deadline</u>	<u>New Deadline</u>
Completion of Discovery and submission of Post-Discovery Joint Status Report	03/07/2025	07/07/2025
Notice of Intent to File Pretrial Dispositive Motions	03/21/2025	07/21/2025

3. Defendants' Counsel, Dwight D. Jackson, has been consulted and consents to the requested extension.

4. No party will be unduly prejudiced by the requested extensions of time should the requested relief be granted.

WHEREFORE, Plaintiffs respectfully request this Honorable Court enter an order extending the deadlines set in this Court's Order.

March 6, 2025

Respectfully Submitted,

/s/Ray M. Shepard
Ray M. Shepard, Bar No. 09473
The Shepard Law Firm, LLC
122 Riviera Drive
Pasadena, Maryland 21122
Phone: 410-255-0700
Facsimile: 443-773-1922
Email: Ray@Shepard.Law

*Counsel for Plaintiffs David Gross and
George Russell.*